

Case Name: Rodriguez v. City of New York et al  
Docket #: 21-cv-1649

### INITIAL CONFERENCE QUESTIONNAIRE

1. Have the parties exchanged the automatic disclosures required by Fed. R. Civ. P. 26(a)(1)? Yes
2. If additional interrogatories beyond the 25 permitted under Fed. R. Civ. P. 33(a) are needed, the maximum *additional* ones by: plaintiff(s) \_\_\_\_\_ and defendant(s) \_\_\_\_\_. **The parties do not anticipate needing additional interrogatories.**
3. Maximum number of requests for admission by: plaintiff(s) 10 and defendant(s) 20 (10 for MTA Defendants and 10 for City Defendants)
4. Number of depositions by plaintiff(s) of: parties 10 non-parties 10  
**Plaintiff will seek leave of court for any depositions taken in excess of 10.**
5. Number of depositions by defendant(s) of: parties 3 non-parties 7  
**Defendants will seek leave of court for any depositions taken in excess of 10.**
6. Time limit per deposition (if more than 7 hours permitted by Fed. R. Civ. P. 30 (d)(1) is required):  
n/a
7. Date for completion of factual discovery: March 8, 2022
8. Number of expert witnesses of plaintiff(s): 2 medical 3 non-medical  
Date for expert disclosure, including report(s): April 7, 2022
9. Number of expert witnesses of defendant(s): 2 medical 3 non-medical  
Date for expert disclosure, including report(s): May 23, 2022
10. Dates for completion of expert depositions (if desired): July 22, 2022
11. Time for amendment of the pleadings by plaintiff(s) October 25, 2021 and by defendant(s)  
**30 days after initial pleadings are due.**
12. Number of proposed additional parties to be joined by plaintiff(s) 3 and  
defendant(s) \_\_\_\_\_ and time for adding those parties: November 8, 2021.
13. Types of contemplated dispositive motions: **All parties contemplate filing for summary judgment.**
14. Dates for filing contemplated dispositive motions, or where applicable, requests for a premotion conference: August 22, 2022 (30 days after completion of expert discovery)
15. Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference. **No**
16. Do the parties consent<sup>1</sup> to trial before a magistrate judge pursuant to 28 U.S.C. § 636(d)? (Answer "no" if any party declines to consent, without indicating which party has declined.) Yes \_\_\_\_\_ No X \_\_\_\_\_

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<sup>1</sup> The fillable consent form A0 85 may be found at [https://www.nyed.uscourts.gov/forms/all-forms/general\\_forms](https://www.nyed.uscourts.gov/forms/all-forms/general_forms) and may be filed electronically upon completion prior to the initial conference, or brought to the initial conference and presented to the Court for processing. Consenting does not affect a party's right to a jury trial.